



125 High Street
Oliver Street Tower, 5th Floor
Boston, MA 02110
Tel. 617-357-5200
www.wagnerlawgroup.com

August 16, 2021

Filed by ECF
Senior Judge Edward R. Korman
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

**RE: *Johnna Ayres v. Robert Shiver et al.*,
Docket No. 21-cv-00473 (ERK)(PK)**

Honorable Sir:

This office represents the plaintiff in the instant matter. We received defense counsel's application to withdraw as counsel as well as today's ECF advising us of the hearing scheduled for September 9, 2021. While we do not intend to oppose the motion, the timing of the application is problematic.

We are in the process of drafting a motion for leave to amend the complaint. Due to the nature of the relief sought by counsel for the defendants, timing is an issue. At present, our deadline to serve the motion is September 12, 2021. It is unlikely that the defendants will have new counsel by that date.

To that end, the plaintiff respectfully requests that she have thirty days to file her motion for leave to amend her complaint after defendants' counsel's motion to withdraw has been resolved, or as directed by the court during the hearing on September 9, 2021.

No prior application for the relief herein requested has previously been made.

Sincerely yours,

David G. Gabor

Cc: Isaac Myers III, *by email only*: Isaac@curlewlaw.com